

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Wesley Matthew Kunkel,

Debtor.

Case No. 1:23-bk-01205-HWV

Chapter 13

Related to ECF No. 27

Debtor's Statement in Support of Stipulation Resolving Motion for Relief

The Debtor's Counsel is unable to attend the hearing on this matter scheduled for March 12, 2024, due to a misunderstanding. Counsel is located more than 30 miles from the courthouse and intended to request to appear remotely but did not do so within the timeframe permitted because he thought the hearing was on Wednesday, not Tuesday. Because of other obligations, Counsel is unable to attend in person. Counsel apologizes to the Court for this misunderstanding and will be more careful in the future.

Counsel presumes that the Court scheduled the hearing to express concerns about the Debtor's ability to fund the chapter 13 plan and pay the curative payments required under the stipulation. The Debtor's son, who lives with the Debtor, was recently hired at the local Harley-Davidson manufacturing facility. With that new income, the Debtor's son intends to help the Debtor pay both the mortgage and the curative payments required by the stipulation.

If this statement does not resolve the Court's concern with respect to the stipulation, Counsel has obtained concurrence with opposing counsel to continue the hearing until March 19, 2024, at 9:30 a.m. if the Court is willing to do so. Thank you.

Date: March 11, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
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Certificate of Service

I certify that on this date I caused a true and correct copy of this document to be served on all parties on the clerk's service list through the CM/ECF system.

Date: March 11, 2024

/s/ Michael A. Cibik
Michael A. Cibik